

RCRA INSPECTION
I. SITE IDENTIFICATION

5-5-82

A. Site Name FANSTEEL B. Street (or other identifier) #10 TANTALUM PL
C. City MUSKOGEE D. State OK E. Zip Code 74401 F. County Name MUSKOGEE
G. Site Operator Information
1. Name FANSTEEL 2. Telephone Number (918) 682-6303
3. Street SAME 4. City _____ 5. State _____ 6. Zip Code _____
H. Site Description REFURB TANTALUM & COLOMBIUM
I. Latitude (deg.-min.-sec.) 35 46 30 Longitude (deg.-min.-sec.) 95 20 01
J. Type of Ownership
☐ 1. Federal ☐ 2. State ☐ 3. County ☐ 4. Municipal ☒ 5. Private
K. ☒ 1. Generator ☐ 2. Transporter ☒ 3. Treatment ☒ 4. Storage

INSPECTION INFORMATION

A. Principal Inspector Information
1. Name A.A. COUNTER 2. Title E.S.
3. Organization OSDH 4. Telephone No. (area code & No.) (405) 271-5338

B. Inspection Participants

PAUL EARLY
COLLEEN SMITH
WILLIE TRUBY
JAMES PIERREZ
THOMAS CARLILA

FANSTEEL



195732

**COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST**

FANSZAPU

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.? (262.12 - EPA I.D. No.) ✓ Yes No
RRWM 1.2.4

a. If yes, EPA I.D. No. 0 K D 0 8 7 2 2 1 8 3 1
OSDH D.P. No. - - - - NONE

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? *RRWM 2.1* ✓ Yes No

a. If yes, list wastes and quantities on attachment ** U134 - HF*
(Include EPA Hazardous Waste No.) *U161 MATHI KTD, 130/3074-KR.TON*
(Provide waste name and description.)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.) *RRWM 2.3*

 Yes ✓ No

a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description)

b. Does generator determine characteristics by testing or by applying knowledge of processes? NA

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? Yes No

2. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by generators? i.e. (process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)

a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process? Yes ✓ No
NA

1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? Yes No
RRWM 2.1

2. If equivalent test methods used, attach copy of equivalent methods used.

b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.)

Section C - Manifest

1. Does generator ship hazardous waste off-site?
(Subpart B - The Manifest)

Yes ☒ No

a. If no, do not fill out Section C and D.

b. If yes, identify primary off-site facility(s). Use narrative explanations sheet.)

NA

2. Has generator shipped hazardous waste off-site since November 19, 1980?

Yes ☒ No

3. Is generator exempted from regulation because of:

Small quantity generator (261.5 - Special requirements)

RRWM 2.2

Yes ☒ No

OR

Produces non-hazardous waste at this time
(261.4 - Exclusions)

Yes ☒ No

4. If not exempted does generator use manifest?
(262.20 - General requirements)

Yes ☒ No

a. If yes, does manifest include the following
information (262.21 - Required information)
(Break up items or circle ones not on manifest)

RRWM 3.7

1. Manifest Document No.

Yes ☒ No

2. Generators Name, Mailing Address, Tele. No.

Yes ☒ No

3. Generator EPA I.D. No.

Yes ☒ No

4. Transporter(s) Name and EPA I.D. No.

Yes ☒ No

5. a. Facility Name, Address and EPA
I.D. No.

Yes ☒ No

b. Alternate Facility Name, Address and
EPA I.D. No.

Yes ☒ No

c. Instructions to return to generator if
undeliverable?

Yes ☒ No

6. DOT description of the waste

Yes ☒ No

7. a. Quantity (weight or volume)

Yes ☒ No

b. Containers (type and number)

Yes ☒ No

8. Emergency Information (optional)

(special handling instructions, Phone No.)

Yes ☒ No

NA

9. Is the following certification on each manifest form?

Yes

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests?
(262.40 - Recordkeeping) *RRWM 4.4.1*
(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

Yes

If yes, complete a through e. If questions contain more than one item, circle those not in compliance.

- a. (1) Did generator sign and date all manifests inspected?

Yes

- (2) Who signed for generator? Name _____ Title _____

- b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter?

Yes

- (2) Who signed and dated for transporter? Name _____ Title _____

RRWM 4.3.1

- c. Does generator retain one copy of manifest signed by generator and transporter? *RRWM 3.9*

Yes

- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance?

Yes

RRWM 3.10

- e. If copy of manifest from facility was not returned within 30 days, did generator file an exception report?

- (262.42 - Exception reporting) *RRWM 3.10 ETSR*

Yes

- (1) If yes, did it contain the following information?

Legible copy of manifest

Yes

AND

Cover letter explaining generators efforts to locate waste.

Yes

- f. Does (will) generator retain copies for 3 years?

Yes

*RRWM 4.4.1
1, 3, 1, 5.*

Section D - Pre-Transport Requirements

1. Does generator package waste?

Yes ☐ No ☐

If no, skip the rest of Section D.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) (262.30 - Packaging)

Yes ☐ No ☐

RRWM 3.15 (a)

3. Inspect containers to be shipped. *RRWM 7.1.6*

a. Are containers to be shipped leaking or corroding or bulging?

Yes ☐ No ☐

b. Use narrative explanations sheet to describe containers and condition.

Yes ☐ No ☐

c. Is there evidence of heat generation from incompatible wastes in the containers?

Yes ☐ No ☐

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? (262.31 - Labeling)

Yes ☐ No ☐

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking)

Yes ☐ No ☐

RRWM 3.15 (c)

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking)

Yes ☐ No ☐

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility?

Yes ☐ No ☐

RRWM 3.17

If yes, skip to question #9.

If no, answer rest of question #8.

b. Are containers used to store waste?

Yes ☐ No ☐

(1) If yes, visually inspect containers.

Is the beginning date of accumulation time clearly indicated? *RRWM 3.15 (b)*

Yes ☐ No ☐

NA

- c. (1) Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) RRWM 7.16 Yes ☒ No ☒
- (2) If yes, with what frequency? _____
- d. (1) Does generator handle ignitable or reactive waste? Yes ☒ No ☒
- (2) If yes, does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) inside facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) Yes ☒ No ☒

NOTE: If tanks used, fill out checklist for tanks.

NOTE: If generator accumulates waste on-site for less than 90 days fill out checklist for Facilities, Part 265 - Subparts C and D (Sections B and C of Facilities Checklist) and Section A, Question #7 (Personnel Training).

9. Describe storage area. Use photos and narrative explanation sheet.

Section E - Recordkeeping and Records

1. Is generator keeping the following reports? (262.40 - Recordkeeping) (Note: The following must be kept for a minimum of three (3) years.) RRWM 1, 3, 1.5, 1, 3, 12
- a. Manifests and signed copies from designated facilities? NA Yes ☒ No ☒
- b. QUARTERLY reports RRWM 3.12, 3.7 Yes ☒ No ☒
- c. Exception Reports RRWM 3.10 NA Yes ☒ No ☒
- d. Test results where applicable. Yes ☒ No ☒

2. Where are records kept (at facility or elsewhere)? FACILITY
3. Who is in charge of keeping the records? Name CLAUDE BROWN Title LAB MGR.

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments) RRWM 3.11 Yes ☒ No ☒
- a. If yes, has he filed a notice with the Regional Administrator? NA Yes ☒ No ☒
- b. Is this waste manifested and signed by Foreign consignee? Yes ☒ No ☒
- c. If generator transported wastes out of the country has he received confirmation of delivered shipment? Yes ☒ No ☒

FANSTEEL

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? (265.11 - Identification Number) RRWM 7.1.6
☒ Yes ☐ No
- A. If yes, EPA I.D. No. OKD 087221831
If no, explain OSDH PERMIT NO - - - - - NONE
2. Has facility received hazardous waste from a foreign source? (265.12 - Required notices) ☐ Yes ☒ No
- A. If yes, has he filed a notice with the Reg. Admin. ☐ Yes ☐ No

Waste Analysis

- * (3) Does the facility have a written waste analysis plan? (265.13 - General Waste Analysis) RRWM 7.1.6
☐ Yes ☒ No
- A. If yes, is a copy maintained at the facility? ☐ Yes ☐ No
- B. If no, question #4 not applicable.
- * (4) If yes, does it include:
- A. Parameters for which each waste will be analyzed? ☐ Yes ☒ No
- B. Test methods used to test for these parameters? ☐ Yes ☒ No
- C. Sampling method used to obtain sample? ☐ Yes ☒ No
- D. Frequency with which the initial analysis will be reviewed or repeated? ☐ Yes ☒ No
1. If yes, does it include requirements to re-test when the process or operation generating the waste has changed? ☐ Yes ☒ No
- E. (For off-site facilities) Waste analyses that generators have agreed to supply? N/A
☐ Yes ☐ No
- F. (For off-site facilities) Procedures which are used to inspect and analyze each movement of hazardous waste including:
1. Procedures to be used to determine the identity of each movement of waste? ☐ Yes ☐ No
2. Sampling method to be used to obtain representative sample of the waste to be identified? ☐ Yes ☐ No

NOT ADOPTED

5. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility?
(265.14 - Security)

NP Yes ___ No ___

If no, describe inadequacies. (Use narrative explanations sheet.)

If yes, is security provided through:

- A. 24-hour surveillance system? (e.g. television monitoring or guards)

✓ Yes ___ No ___

OR

- B. 1. Artificial or natural barrier around facility
(e.g. fence or fence and cliff)? RRWM 7.3.1
Describe type of security

✓ Yes ___ No ___

CLIFF ON RIVER SIDE 6' CHAIN LINK

AND

2. Means to control entry through entrances (e.g. attendant, television monitors, locked entrance, controlled roadway access)? RRWM 7.3.1
Describe type of security.

✓ Yes ___ No ___

Include a drawing indicating any inadequacies in the facility's security system..

6. Is a sign with the legend, "Danger-Unauthorized Personnel Keep Out," posted at the entrance to the active portion of the facility?
(265.14 - Security) RRWM 7.4.1

✓ Yes ___ No ___

Is it written in English and legible from at least 25 feet? ___ Yes ___ No

(NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must be in Spanish).

If an existing sign with a legend other than "Danger-Unauthorized Personnel Keep Out," what does that legend say?

PRIVATE PROPERTY - KEEP OUT

General Inspection Requirements

NOT ADOPTED

7. A. Does the owner/operator maintain a written schedule for inspecting: (265.15 - General Inspection Requirements)

___ Yes ___ No

1. Monitoring equipment? (If applicable) ☐ Yes ☐ No
2. Safety and emergency equipment? ☐ Yes ☐ No
3. Security devices? ☐ Yes ☐ No
4. Operating and structural equipment (if applicable) ☐ Yes ☐ No
5. Does the schedule or plan identify the types of problems to be looked for during inspection? ☐ Yes ☐ No
 - a. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.) ☐ Yes ☐ No
 - b. Operator error ☐ Yes ☐ No
 - c. Discharges (e.g. leaks from valves or pipes joint breaks, etc.) ☐ Yes ☐ No
- B. Is a written schedule for these inspections maintained at the facility? ☐ Yes ☐ No
 1. Are these inspections conducted? ☐ Yes ☐ No
 - a. Is a record of these inspections maintained in the inspection log? ☐ Yes ☐ No
8. Does the owner/operator have an inspection log? *NOT ADOPTED* ☐ Yes ☐ No

(265.15 - General Inspection Requirements)

 - A. If yes, does it include:
 1. Date and time of inspection? ☐ Yes ☐ No
 2. Name of inspector? ☐ Yes ☐ No
 3. Notation of observations? ☐ Yes ☐ No
 4. Date and nature of repairs or remedial action? ☐ Yes ☐ No
 - B. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected? (Use narrative explanation sheet). ☐ Yes ☐ No
 - C. Are records of the inspection log maintained at the facility for three (3) years? ☐ Yes ☐ No

DOES O/O MAKE ONLY INSPECTIONS OF MAJOR FEATURES (PRM 7.7.1) ☒ YES ☐ NO

DOES O/O MAKE WEEKLY INSPECTIONS OF ALL FEATURES (PRM 7.7.2) ☒ YES ☐ NO

X DOES O/O KEEP AN INSPECTION LOG (PRM 7.7.3) ☐ YES ☒ NO

Personnel Training

9. Does the owner/operator have Personnel Training Records? (265.16 - Personnel Training) *RRivm 7.1.6*

☒ YES ☐ NO

A. If yes, do they include:

1. Job title and written job description of each position? ☒ Yes ☐ No
2. Description of type and amount of training? ☒ Yes ☐ No
3. Records of training given to facility personnel? ☒ Yes ☐ No

B. Are these records maintained at the facility?

☒ Yes ☐ No

Requirements for Ignitable, Reactive or Incompatible Waste

10. Does facility handle ignitable or reactive wastes? (265.17 - Ignitable, Reactive, Incompatible Wastes) *RRivm 7.1.6*

☐ Yes ☒ No

(Circle appropriate type(s) of waste(s).)

A. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat?

NA

☒ Yes ☐ No

B. Are smoking and open flame confined to specifically designated locations?

☐ Yes ☐ No

C. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled?

☐ Yes ☒ No

11. Check containers (265.17 - Ignitable, Reactive, Incompatible Wastes) *RRivm 7.1.6*

NA

A. Are containers leaking or corroding or bulging? (Use narrative explanation sheet to explain containers in this condition.)

☐ Yes ☐ No

B. Has the facility ever placed incompatible wastes together?

☐ Yes ☐ No

If yes, what were the results? (Use narrative explanation sheet). (Look for signs of mixing of incompatible wastes. e.g., fire, toxic mist, heat generation, bulging containers, etc.)

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities) *RR/wm 7/1/6*

☒ Yes ☐ No

If yes, indicate primary authority *MUSKOGEE*

- A. Is the fire department a city or volunteer fire department? _____

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? *7/1/6*

☒ Yes ☐ No

Are they readily available to the emergency coordinator?

☐ Yes ☐ No

(265.37 - Arrangements with local authorities)

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?

☒ Yes ☐ No

If no, has the owner/operator attempted to do this?

☐ Yes ☐ No

(265.37 - Arrangements with local authorities) *7/1/6*

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities)

NA
☐ Yes ☐ No

Section C - Contingency Plan and Emergency Procedures

RR/wm 7/1/6

*

1. Does the facility have a contingency plan? (265.51 - Purpose and implementation of contingency plan.)

☐ Yes ☒ No

2. Is it maintained at the facility? (265.53 - Copies of contingency plan.)

☐ Yes ☐ No

3. Is the contingency plan a revised SPCC Plan? (265.52 - Content of Contingency plan)

☐ Yes ☒ No

4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency coordinator)

☐ Yes ☐ No

5. Who is the emergency coordinator? _____
(265.55 - Emergency coordinator)

6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.52 - Content of contingency plan.)

☐ Yes ☐ No

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) *RRWM 7.1.6* ☐ Yes ☒ No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)

A. Internal communications or alarm system? ☒ Yes ☐ No

1. Is it easily accessible in case of emergency? ☒ Yes ☐ No

B. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No

C. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No

1. Is this equipment tested to assure its proper operation? ☒ Yes ☐ No

D. Water of adequate volume for hoses, sprinklers or water spray system? *NA* ☐ Yes ☐ No

1. Describe source of water _____

2. Indicate flow rate and/or pressure and storage capacity if applicable. _____

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g. adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required aisle space) *RRWM 7.1.6* *NA*

☐ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) *PRE FIRE PLANNING*

☒ Yes ☐ No

If no, has the owner/operator attempted to make such arrangements?

☐ Yes ☐ No

Section D - Manifest System, Recordkeeping and Reporting

1. Has facility received hazardous waste from off-site since November 19, 1980? (265.71 - Use of manifest system) *NOT ADAPTED*

Yes No

a. If no, questions 1, 2 and 3 not applicable.

b. If yes, does the facility retain copies of all manifests? *RRWM 7.3.1.6.1*

Yes No

1. Are the manifests signed and dated and returned to the generator?

Yes No

2. Is a signed copy given to the transporter?

Yes No

2. Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since Nov. 19, 1980? (265.71 - Use of manifest system) *NOT ADAPTED*

Yes No

a. If yes, is it accompanied by a shipping paper

Yes No

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator?

Yes No

2. Is a signed copy given to the transporter?

Yes No

3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? (265.72 - Manifest discrepancies) *RRWM 7.7.6*

Yes No

a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter?

Yes No

1. If no, has Regional Administrator been notified?

Yes No

4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (265.76 - Unmanifested waste report) *RRWM 7.1.6*

Yes No

a. If yes, has he submitted an unmanifested waste report to the Regional Administrator?

Yes No

* 5. Does the facility have a written operating record? (265.73 - Operating record) *RRWM 7.1.6*

Yes No

a. Is a copy maintained at the facility?

Yes No

5. b. Does the record include:

1. Description and quantity of each hazardous waste received and the methods and dates of its treatment, storage or disposal at the facility? ___ Yes ___ No
2. Location and quantity of each hazardous waste at each location? ___ Yes ___ No
 - a. Is this information cross-referenced with the manifest which was included with that hazardous waste shipment? ___ Yes ___ No
3. (For disposal facilities only) Is the location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area? ___ Yes ___ No
4. Record and results of waste analyses? ___ Yes ___ No
5. Reports of incidents involving implementation of the contingency plan? (If applicable) ___ Yes ___ No
6. Records and results of required inspections since November 19, 1980? ___ Yes ___ No
7. Monitoring, testing or analytical data where required? ___ Yes ___ No
8. Closure cost estimates and for disposal facilities, post-closure cost estimates? (effective May 19, 1981.) ___ Yes ___ No
9. Handling codes for treatment, storage and disposal methods? *P. 33252* ___ Yes ___ No
10. Physical forms of the wastes? ___ Yes ___ No
11. Processes that produce the wastes? ___ Yes ___ No
12. For wastes containing more than one listed waste or waste characteristic, all applicable EPA Hazardous Waste Numbers and the quantities of each constituent waste? ___ Yes ___ No

Section E - Plans and Reports

1. Have all plans and reports been visually inspected and /or been made available for inspection? (265.74 - Availability, retention and disposition of records) *RRWM 7.1.6 & 1.3.1.1* ☒ Yes ☐ No

List plans and/or reports not made available for inspection.

2. Did operator provide inspector with a drawing of the facility? ☒ Yes ☐ No

a. If yes, please indicate which are hazardous waste facilities on the drawing.

3. Indicate types of hazardous waste facilities.

- ☐ Containers
☐ Tanks
☒ Surface Impoundments
☐ Waste Piles
☐ Land Treatment
☐ Landfill
☐ Incinerator
☐ Thermal Treatment
☐ Chemical, Physical and Biological Treatment

Section F - Groundwater Monitoring

1. Are there any ground water monitoring wells? (265.90 Applicability) *RRWM 7.1.6* ☒ Yes ☐ No

a. Is owner/operator aware that prior to 11/19/81 he must install, operate and maintain a groundwater monitoring system (unless waived in writing)? ☒ Yes ☐ No

Not
Done

GROUNDWATER MONITORING CHECKLIST

The owner or operator of a surface impoundment, landfill, or land treatment facility which is used to management hazardous waste must implement a ground-water monitoring program. (Part 265, Subpart F) P 332.40 & 41

RRM 7.1.6 IAW 40 CFR 265.80

1. Specify the site(s) for which a ground water monitoring system (has) or (should have) been installed: _____

2. What date was the monitoring program initiated (date of first sampling)? _____

3. Indicate by a map or sketch locations of each monitoring well and distance from active site(s) (attach). Also list depths, diameter and completion data on each well (or include well drilling and completion report). Indicate whether the wells are hydraulically upgradient or downgradient and the direction of flow of the groundwater. IAW 40 CFR 265.81

4. If no ground water monitoring system has been installed, include a copy of Low Potential Ground Water Demonstration used to document a low potential for migration of hazardous waste or constituents. Also describe briefly what basis was used to justify the waiver of monitoring requirements:

IAW 40 CFR 265.190 C

5. If a ground water monitoring system has been installed, attach a copy of the ground water sampling and analysis plan. Briefly describe sample collection technique for obtaining samples and the method used to establish elevation of ground water for ground water monitoring wells:

IAW 40 CFR 265.82

6. Is a Ground Water Quality Assessment Plan maintained at the facility?

IAW 40 CFR 265.83

Yes _____ NO _____ N/A _____

7. Indicate the name and address of the facility conducting the analyses. What quality assurances procedures are followed?

FAN ~~FEU~~ Pond 516
RRWM 7.10.2

SURFACE IMPOUNDMENTS CHECKLIST
Subpart K - Surface Impoundments 265.220

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future?

___ Yes ___ ☒ No

- a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment?

___ Yes NA ___ No

2. Are impoundments presently used to treat or store waste?

265.220 ___ Yes ___ No

3. Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard?

265.222 ___ Yes ___ ☒ No

- a. If no, what was the freeboard? _____

4. Is there evidence of overtopping of the dike?

___ Yes ___ ☒ No

If yes, please describe: _____

5. Does the impoundment have a containment system? 265.223 ___ Yes ___ No

- a. Does the earthen dike have adequate protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? (Use narrative explanation sheet to explain deficiencies.)

265.223 ___ Yes ___ No

- b. Provide description of containment. _____

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet).

H. F.

7. Are hazardous wastes chemically treated in the impoundment?

265.225 ___ Yes ___ ☒ No

- a. If yes, are

1. Waste analyses and trial tests conducted on these wastes or

NA ___ Yes ___ No

2. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions?

___ Yes ___ No

- b. Is this information retained in the operating record?

___ Yes ___ No

265.226

8. Is the impoundment inspected to check freeboard level? ☒ Yes ☐ No

If yes, with what frequency? DAILY

9. Are the impoundments, dikes and vegetation surrounding the dike inspected to detect leaks, deterioration or failures? (265.226 - Inspections) ☒ Yes ☐ No

If yes, with what frequency? WEEKLY

X (10) Does the facility maintain a record of the closure plan on site? (Effective May 19, 1981) 265.228 ☐ Yes ☒ No

11. Are ignitable or reactive wastes placed in the impoundment? ☐ Yes ☒ No

265.229

a. If no, do not complete b and c.

b. If yes, are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

NA

☐ Yes ☒ No

OR

c. Is the impoundment used solely for emergencies? ☐ Yes ☒ No

1. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation.

12. Has the facility ever placed incompatible wastes in the impoundment? 265.230 ☐ Yes ☒ No

a. If yes, what were the results. (Use narrative explanation sheet.) (Look for signs of mixing of incompatible wastes e.g., fire, toxic mist, heat generation, bulging containers, etc.)

13. What is the impoundment lined with? NATIVE SOIL

FANSTER Pond 2

SURFACE IMPOUNDMENTS CHECKLIST
Subpart K - Surface Impoundments 265.220

RRWM 7.10.2

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future?

___ Yes ___ ☒ No

- a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment?

___ Yes ___ No

2. Are impoundments presently used to treat or store waste?

___ ☒ Yes ___ No

- * (3) Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard?

___ Yes ___ ☒ No

- a. If no, what was the freeboard? NE CORNER POND 7

4. Is there evidence of overtopping of the dike?

___ Yes ___ ☒ No

If yes, please describe. _____

5. Does the impoundment have a containment system? 265.223 ___ ☒ Yes ___ No

- a. Does the earthen dike have adequate protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? (Use narrative explanation sheet to explain deficiencies.) ___ ☒ Yes ___ No

- b. Provide description of containment. _____

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). H.F

7. Are hazardous wastes chemically treated in the impoundment? 265.225 ___ Yes ___ ☒ No

- a. If yes, are

1. Waste analyses and trial tests conducted on these wastes or

___ Yes ___ No

2. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions?

___ Yes ___ No

- b. Is this information retained in the operating record?

___ Yes ___ No

265.226

8. Is the impoundment inspected to check freeboard level? ☒ Yes ☐ No

If yes, with what frequency? DAILY

9. Are the impoundments, dikes and vegetation surrounding the dike inspected to detect leaks, deterioration or failures?
(265.226 - Inspections)

☒ Yes ☐ No

If yes, with what frequency? WEEKLY

- * 10. Does the facility maintain a record of the closure plan on site? (Effective May 19, 1981) 265.228 ☐ Yes ☒ No

11. Are ignitable or reactive wastes placed in the impoundment? 265.229 ☐ Yes ☒ No

a. If no, do not complete b and c.

b. If yes, are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

NA
☐ Yes ☐ No

OR

c. Is the impoundment used solely for emergencies?

☐ Yes ☐ No

1. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation.

12. Has the facility ever placed incompatible wastes in the impoundment? 265.230

☐ Yes ☒ No

a. If yes, what were the results. (Use narrative explanation sheet.)
(Look for signs of mixing of incompatible wastes e.g., fire, toxic mist, heat generation, bulging containers, etc.)

13. What is the impoundment lined with? NATIVE CLAY

SURFACE IMPOUNDMENTS CHECKLIST
Subpart K -- Surface Impoundments 265.220

RRWM 7.10.2
 7.1.6

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? Yes ☒ No

a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? NA Yes ☐ No ☐

2. Are impoundments presently used to treat or store waste? 265, 222 Yes ☒ No ☐

* (3) Does the impoundment appear to maintain at least 2 feet (60 cm) of freeboard? 265, 222 Yes ☒ No ☐

a. If no, what was the freeboard? SE CORNER POND 8

4. Is there evidence of overtopping of the dike? Yes ☐ No ☒

If yes, please describe. _____

5. Does the impoundment have a containment system? 265, 223 Yes ☒ No ☐

a. Does the earthen dike have adequate protective cover (e.g. grass, shale, rock) to minimize wind and water erosion? (Use narrative explanation sheet to explain Yes ☒ No ☐ deficiencies.)

b. Provide description of containment. EROSION on DOWN
SIDE OF DIKE

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). H.F

7. Are hazardous wastes chemically treated in the impoundment? 265, 225 Yes ☐ No ☒

a. If yes, are

1. Waste analyses and trial tests conducted on these wastes or NR Yes ☐ No ☒

2. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? Yes ☐ No ☒

b. Is this information retained in the operating record? Yes ☐ No ☒

265.226

8. Is the impoundment inspected to check freeboard level? ☒ Yes ☐ No

If yes, with what frequency? DAILY

9. Are the impoundments, dikes and vegetation surrounding the dike inspected to detect leaks, deterioration or failures? (265.226 - Inspections)

☒ Yes ☐ No

If yes, with what frequency? WEEKLY

* (10.) Does the facility maintain a record of the closure plan on site? (Effective May 19, 1981) 265.228 ☐ Yes ☒ No

11. Are ignitable or reactive wastes placed in the impoundment? 265.229 ☐ Yes ☒ No

a. If no, do not complete b and c.

b. If yes, are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive?

NR
☐ Yes ☐ No

OR

c. Is the impoundment used solely for emergencies? ☐ Yes ☐ No

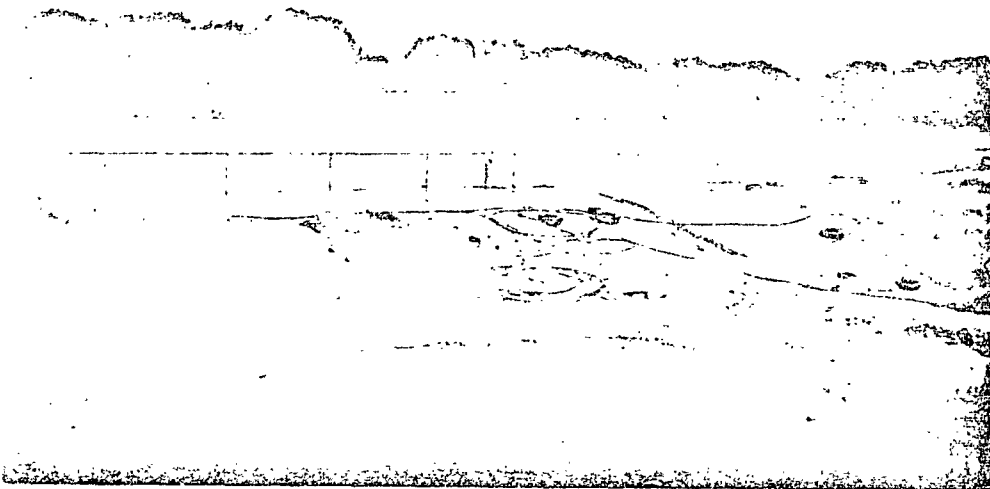
1. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation.

12. Has the facility ever placed incompatible wastes in the impoundment? 265.230

☐ Yes ☒ No

a. If yes, what were the results. (Use narrative explanation sheet.) (Look for signs of mixing of incompatible wastes e.g., fire, toxic mist, heat generation, bulging containers, etc.)

13. What is the impoundment lined with? HYDALON



Photographer / Witness PHOTO #1

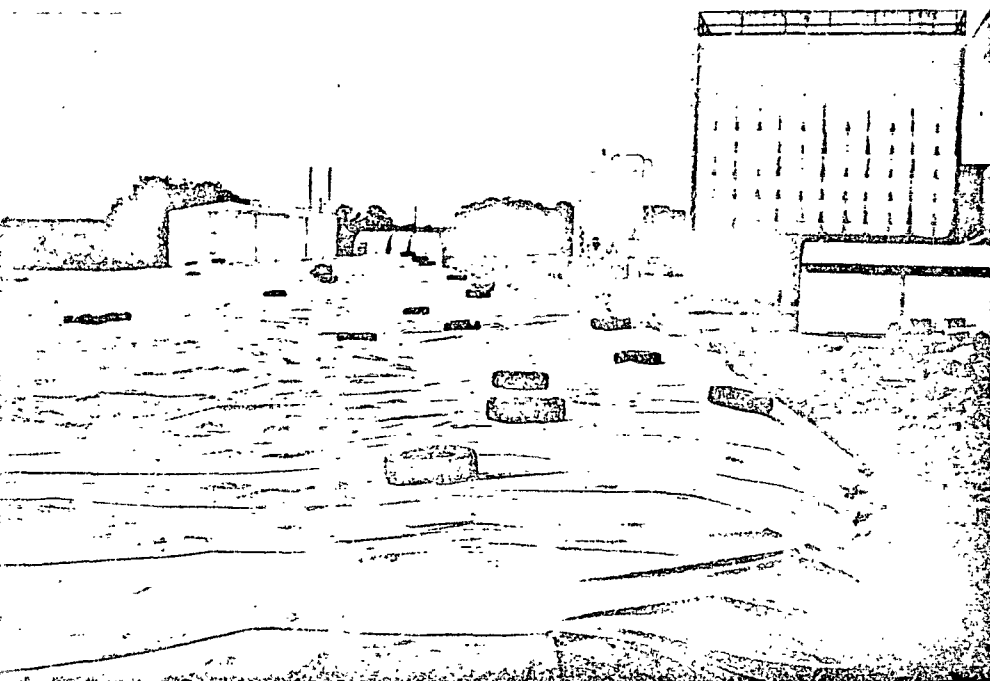
SANDRA KUKLIN ANTONETTE / GORDON DUNCAN

Date / Time / Direction

6-23-81 / 1100 / WEST

Comments: ACID WASTEWATER PIT
WITH NRC RUNOFF PATH.

STANDING WATER IN FERRERLAND.
LINER IN GOOD CONDITION



Photographer / Witness PHOTO #2

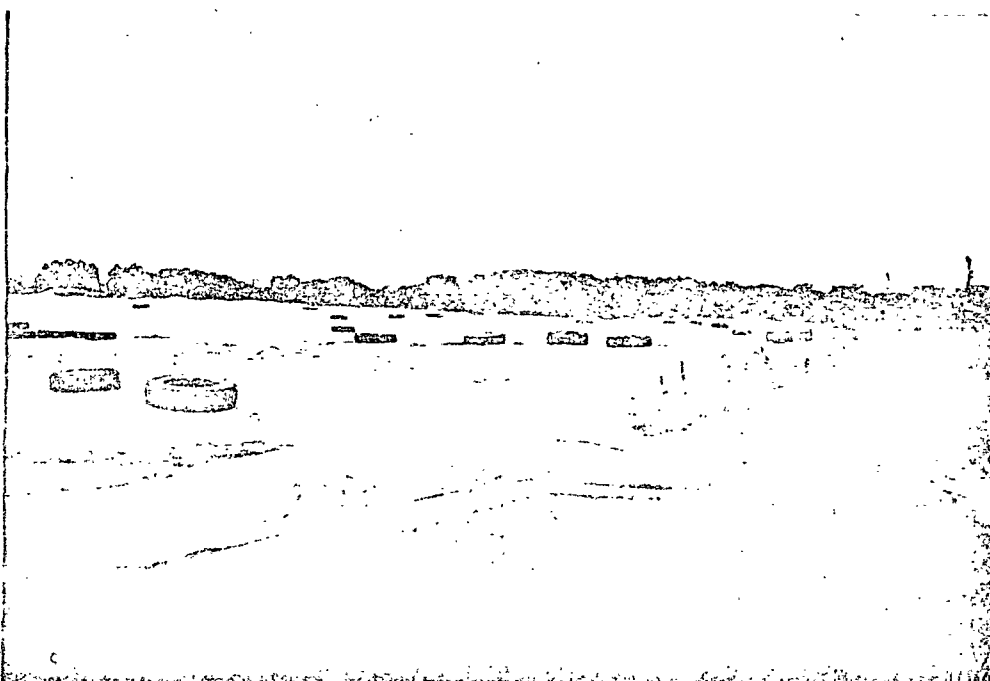
SANDRA ANTONETTE / GORDON DUNCAN

Date / Time / Direction

6-23-81 / 1057 / SOUTH

Comments: ACID SLUDGE FROM ACID
PIT (PHOTO #1) COVERED WITH
LINER. LINER IN FAIR CONDITION.

SLUDGE DEPOSITED EAST OF ACID PIT.



Photographer / Witness PHOTO #3

SANDRA ANTONETTE / GORDON DUNCAN

Date / Time / Direction

6-23-81 / 1105 / NW

Comments: ACID SLUDGE



Photographer / Witness PHOTO #4

SANDRA ANTICINETTE / GORDON DEANAN

Date / Time / Direction

6.23.81 / 1120 / SW

Comments: PHOTOS OF #2 & #3

LIME SETTLING PONDS. FLUIDS IN
THESE PONDS COMES FROM MAIN
LIME SETTLING POND



Photographer / Witness PHOTO #5

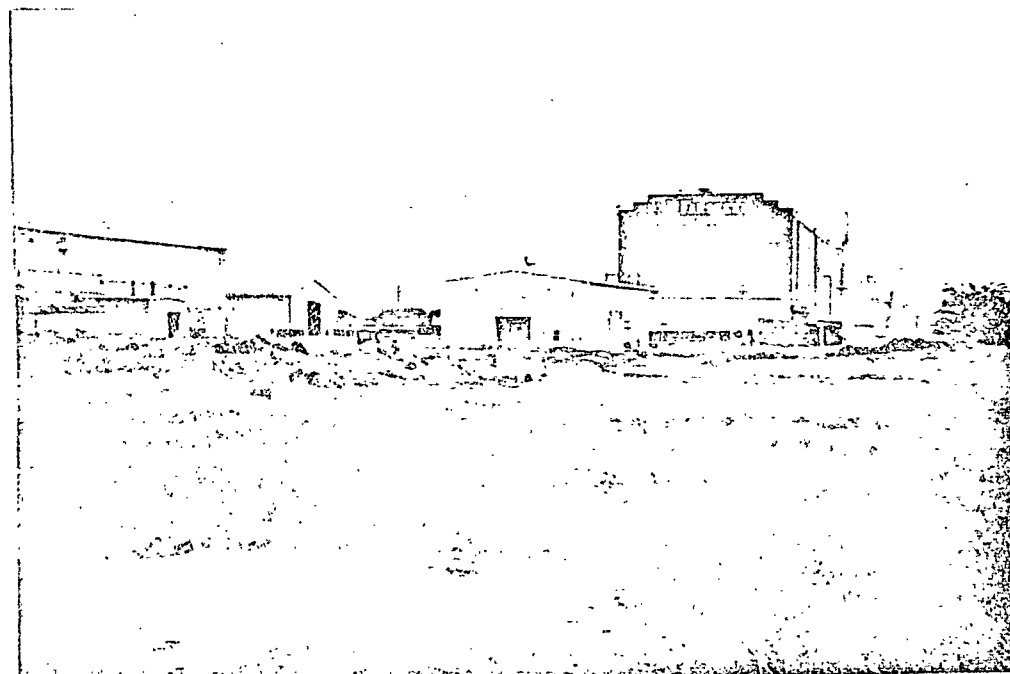
SANDRA ANTICINETTE / GORDON DEANAN

Date / Time / Direction

6.23.81 / 1109 / NW

Comments: EMPTY TIN SLAG DRUMS

(foreground) and FULL HYDROFLUORIC
CHLORIC ACID DRUMS (left
background). NORTH OF LIME POND.



Photographer / Witness PHOTO #6

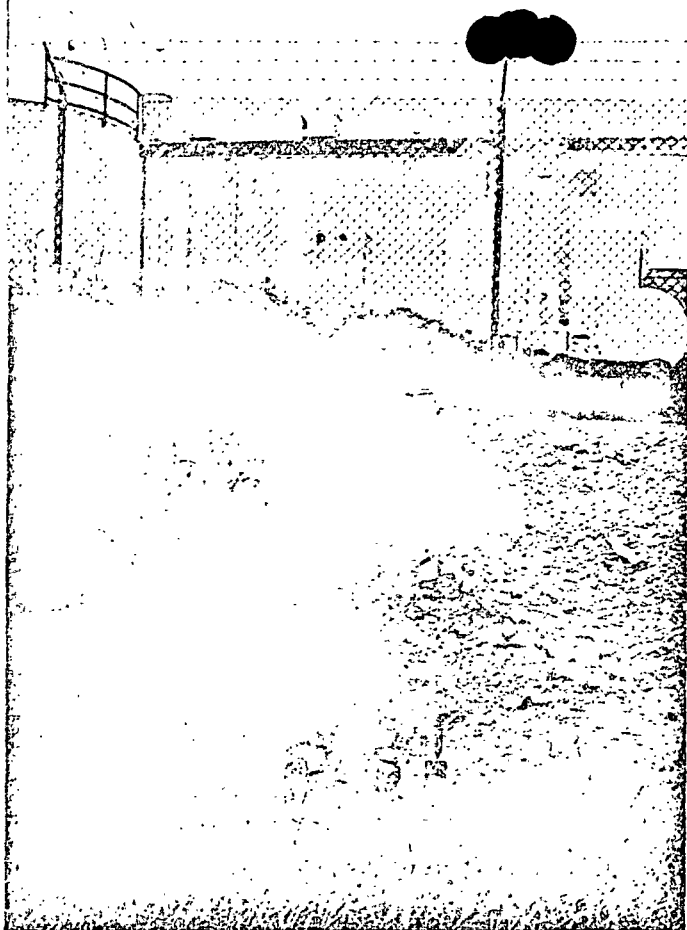
SANDRA ANTICINETTE / GORDON DEANAN

Date / Time / Direction

6.23.81 / 1127 / NW

Comments: OLD LIME SETTLING POND

CURRENTLY BEING USED AS
ON-SITE SOLID WASTE LANDFILL.



Photographer / Witness PHOTO #7

SANDRA ANTOINETTE / GORDON DUNCAN

Date / Time / Direction

JUNE 23, 1981 / 1205 / WEST

Comments: SAMPLE POINT #1.

SAMPLE OF SEDIMENT OF SEEPAGE

THROUGH DIKE TO OFF SITE.

(SEE AERIAL PHOTOGRAPH FOR
SAMPLE POINT REFERENCE)

Photographer / Witness

Date / Time / Direction

Comments:

Photographer / Witness PHOTO #8

SANDRA ANTOINETTE

Date / Time / Direction

6-23-81 / 1215 / EAST

Comments: SURFACE WATER RUNOFF

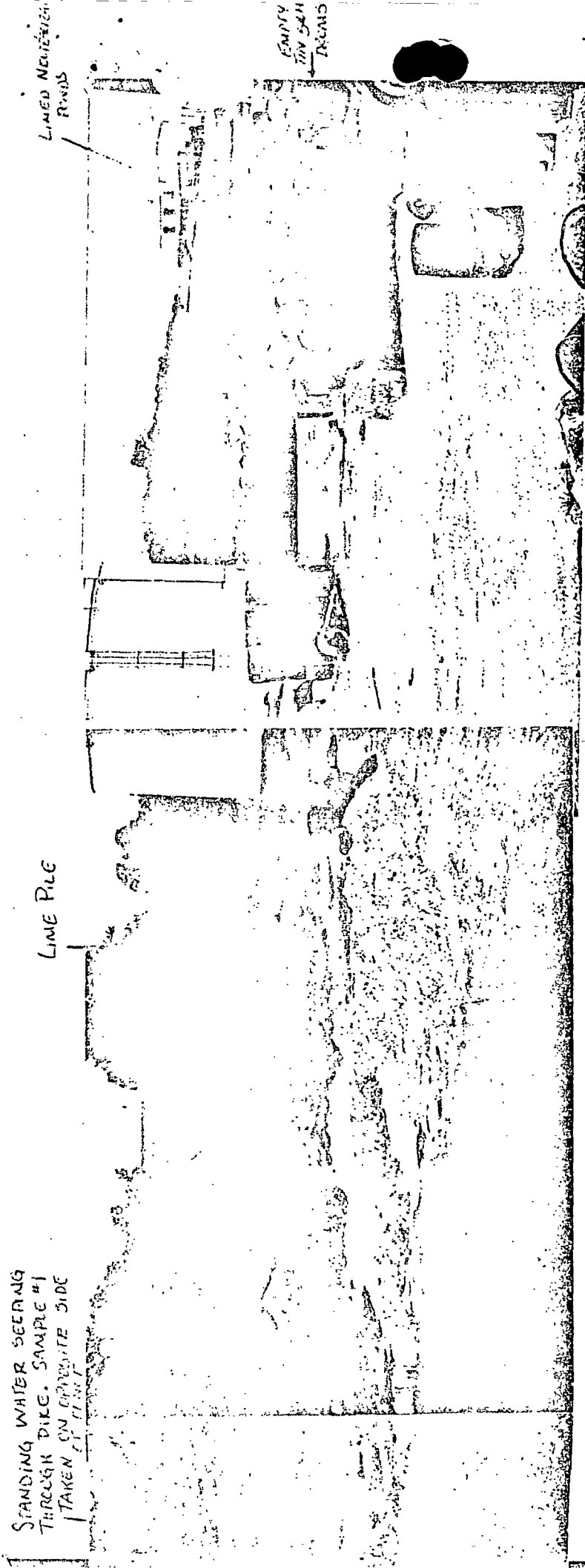
CUTFALL INTO ARKANSAS RIVER.

SAMPLE #2 TAKEN DOWNDIP

FROM THIS POINT. SEE AERIAL

PHOTO FOR SAMPLE POINT
REFERENCE





Photographer / Witness (PANORAMA #1)

SANDRA KUKLISH / GORDEN DUNCAN

Date / Time / Direction

JUNE 23, 1981 / 1109 / SOUTH TO EAST

Comments: PANORAMA OF OPEN

LINE PILE AND EMPTY TIN SLAG

DRUMS. RUNOFF GOES THROUGH

LINE PILE AND COLLECTS NEAR DIKE.

Photographer / Witness

Date / Time / Direction

Comments:

Photographer / Witness

Date / Time / Direction

Comments:

Photographer / Witness (PANOBAMA #2)

SANDRA ANTONETTE / GORDON DUNCAN

Date / Time / Direction

JUNE 23, 1981 / 1120 / WEST TO SOUTH

Comments: PACT OF LIME

SETTLING POND. OVERFLOW

RUNS INTO TWO ADJACENT

SETTLING PONDS (SEE PHOTO #4)

Photographer / Witness

Date / Time / Direction

Comments:

Photographer / Witness

Date / Time / Direction

Comments: